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Attorneys for the United States of America

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES *ex rel.* BONNIE  
LAMMERS, M.D., ) NO. CV 08-3411 WHA (DMR)  
Plaintiff and Relator, )  
 ) **STIPULATION OF DISMISSAL;**  
v. ) **[PROPOSED] ORDER**  
 )  
FARIDEH HEIDARPOUR, *et al.*, )  
Defendants. )

Subject to the Court's approval, and pursuant to Fed. R. Civ. P. 41(a)(2), IT IS HEREBY  
STIPULATED by the United States of America, *qui tam* Relator Bonnie Lammers, and Defendants  
Michael Hebrard, M.D., Richard Lavigna, D.P.M., Advanced Physical Medicine & Rehab Group, Inc.,  
Advanced Occupational Rehabilitation, Inc., Advanced Medicine and Rehabilitation of Texas, Inc., and  
Advanced Medicine and Rehabilitation of Texas, P.A., that this action is dismissed with prejudice.

1. This action named nine Defendants. The three Defendants not listed above (Defendants Farideh Heidarpour, Ali Heidarpour, and A.B.C. Billing, Inc.) were dismissed from this case by Order dated September 8, 2015, after those Defendants paid the amounts due under their August 28, 2013 settlement agreement.

2. The remaining Defendants have now paid the amounts due under their July 11, 2012 settlement agreement, and they are being dismissed with prejudice, pursuant to the terms of the July 11, 2012 settlement agreement. Accordingly, the entire case is now being dismissed with prejudice.

## IT IS SO STIPULATED.

Respectfully submitted,

**BRIAN J. STRETCH**  
Acting United States Attorney

Dated: February 1, 2016

By: \_\_\_\_\_ /s/ *signature on file*  
SARA WINSLOW  
MELANIE L. PROCTOR  
Assistant United States Attorneys  
Attorneys for the United States

## MCBREEN & SENIOR

Dated: February 1, 2016

By: /s/ *signature on file*  
MATTHEW WESTON  
Attorney for Relator

## LAW OFFICES OF DENISE EATON-MAY

Dated: January 18, 2016

By: \_\_\_\_\_ /s/ *signature on file*  
DENISE EATON MAY  
Attorney for Defendants Michael H.  
Advanced Physical Medicine & Reha-  
Advanced Occupational Rehabilitation  
Advanced Medicine and Rehabilita-  
Inc., and Advanced Medicine and R-  
Texas, P.A.

KNIGHT EMPLOYMENT LAW

Dated: January 21, 2016

By: \_\_\_\_\_ /s/ *signature on file*  
**CODY D. KNIGHT**  
Attorney for Defendant Richard La

1                   **[PROPOSED] ORDER**  
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3                   PURSUANT TO STIPULATION, IT IS HEREBY ORDERED that this action is dismissed with  
4 prejudice.

5                   IT IS SO ORDERED.  
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Dated: February 2, 2016.



7                   HONORABLE WILLIAM ALSUP  
8                   United States District Judge  
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